City of Paso Robles 2007-2008 ANNUAL REPORT

General Permit for the Discharger of Storm Water from Small Municipal Separate Storm Sewer Systems (General Permit)

Check box if this is a new name, address, etc.

Permittee Information

1.	Permittee (Agency Name): City of El Paso de Robles	
2.	Contact Person: Patti Gwathmey	🛛
3.	Mailing Address: 1000 Spring Street	
4.	City, State and Zip Code: Paso Robles, CA 93446	
5.	Contact Phone Number: (805) 227-1654	
6.	WDID # 3 40MS03019	
7.	Have any areas been added to the MS4 due to annexation or other legal means?	YES ☐ NO ⊠
8.	Are you subject to the Design Standards contained in Attachment 4 of the General Permit?	YES ⊠ NO □

Reporting Period: July 1, 2007 to June 30, 2008

Table of Contents

Executive Summary	1
Status of Measurable Goals	2
Rating Effectiveness	5
Minimum Control Measures	7
Public Education and Outreach	7
Public Involvement and Participation	
Illicit Discharge Detection and Elimination	
Construction Site Storm Water Control	
Post-Construction Storm Water Management	
Pollution Prevention/Good Housekeeping for Municipal Operations	53
Certification	
List of Tables	
Table 1. Status of Measurable Goals	2
Table 2. Adopted Sections of Roads	
Table 3. Storm Water Web Page Hits	
Table 4. Public Education and Outreach	
Table 5. Water Education Program	21
Table 6. Storm Water Training	24
Table 7. Additional Staff Training	
Table 8. Public Participation and Involvement	
Table 9. Targeted Outfalls	34
Table 10. Types of Notice of Violations	
Table 11. Illicit Discharge Detection and Elimination	
Table 12. Construction Site Storm Water Control	
Table 13. Post-Construction Storm Water Management	
Table 14. Facility Inspections	
Table 15. Storm Water Training	
Table 16. Additional Staff Training	
Table 17. Pollution Prevention/Good Housekeeping for Municipal Operations	59

Executive Summary

The City continues to make significant progress in the implementation of the Storm Water Management Plan (SWMP). (See Table 1 for a Status of the Measurable Goals for Year 3.) The most significant progress made this reporting period is in implementation of Public Education and Illicit Discharge Detection and Elimination minimum control measures. In March 2008, storm water staff began issuing Notice of Violations (NOVs) for illicit discharges to the storm drain system. General brochures for businesses and homeowners as well as brochures on specific topics such pressure washing and food facilities were created and distributed with the NOVs.

In June 2008 the City began inspecting food facilities. This program focuses on reducing the amount of Fats, Oils and Grease (FOG) discharged to the City's collection system which can cause sanitary sewer overflows and storm water issues such as washing down outside surfaces and cleaning equipment outside. Although neither of these programs is required in the current Storm Water Management Plan, these programs are crucial to raising the awareness of the Storm Water Program and improving the quality of storm water runoff and eliminating non-storm water discharges. These two programs have significantly increased business owners awareness about the Storm Water Program and should reduce the amounts of oil, grease and other pollutants from reaching the storm drain system.

In Year two, the City's contractor prepared a draft ordinance for Illicit Discharge, Post Construction, and Grading. All three of these ordinances were to be adopted by City Council in Year 3, however this was not accomplished. The City is currently working on developing a LID Design Manual to meet the requirements of Attachment 4. Once this manual is adopted, the Post Construction Ordinance will be revised to include Attachment 4 requirements and references to the manual. The draft Grading Ordinance that was prepared was from a template. After reviewing the City's current Ordinance, it was decided that it is more comprehensive and has requirements specific to the City of Paso Robles. Therefore, the current Grading Ordinance will be revised to include Attachment 4 requirements, references to the LID Design manual and the State's Construction Permit, as well as updating the current language. The adoption of these three ordinances, revising the Engineering Standards, and the development of a LID Design Manual are a priority for the City in the next reporting period.

Over the past three years, the Storm Water Program has been implemented by a variety of people including both City staff and private consultants which has created inconsistencies in how the program has been implemented and how the Storm Water Management Plan has been revised. In May 2007 the revised SWMP was modified as required by the Regional Water Quality Control Board. However, these corrections did not address issues such as disorganization and redundant BMPs. Modifications are proposed in this report that will organize the existing BMPs into related groups, eliminate redundancy, and clarify the goals of the BMP which will make the BMPs more effective and easier to track and report.

Overall, the City feels that progress is being made implementation of the program and that the awareness of the Storm Water Program is increasing. This is the first step in changing the behaviors that will result in achieving the goal of improved water quality.

Status of Measurable Goals

Table 1. Status of Measurable Goals

ВМР	Description	Measurable Goal	Sta	ntus
			Staus	On Schedule
		Public Education and Outreach		
PE1 Adopt-A-Street (ongoing) and the # of water quality to		PE-1A: Track the # and % of increase in streets adopted (ongoing) and the # of water quality brochures/fact sheets distributed to those who adopt streets.	Ongoing	Yes
PE2	Storm Water Web Site	PE-2: Track the number of web site hits. (Ongoing)	Ongoing	Yes
		PE-3A: Complete watershed fact sheet for all residences (Year 2) and distribute in their Utility bills.	Completed	Yes
PE3	Brochures and Fact Sheets	PE3-B: Develop construction outreach brochure and distribute to all SWPPP required construction projects. (Year 2)	Completed	Yes
		PE-3C: Develop business outreach brochure. (Year 3)	Completed	Yes
		PE-3D: Develop and distribute illicit discharge brochure. (Year 2)	Completed	Yes
PE4	Storm water hotline	PE-4: Establish a storm water program hotline. (Year 2)	Completed	Yes
PE5	Storm drain marking	PE-5: Mark all storm drain inlets with "don't dump, drains to river" markers. (Year 3)	Ongoing	Yes
PE6	Event Participation	PE-6A: Identify local public events suitable for storm water information distribution (Year 1) and participate in local public events suitable to distribute storm water information. (Begin Year 2/ongoing)	Completed	Yes
		Public Participation and Involvement		
DD4	Duklia Maskinsa	PP-1A: Whether or not a public meeting was held prior to SWMP approval. (Year 1)	Completed	Yes
PP1	Public Meetings	PP-1B: Whether or not a public meeting was held during Years 2 and 4 of SWMP implementation period.	Ongoing	Yes
PP2	Public	PP-2A: Completion of stock Presentation	Completed	Yes
FF 4	Presentations	PP-2B: 5 presentations held per year. (Ongoing)	Ongoing	Yes
PP3	Web Page	PP-3: Is a comment form is included on the City's web page. (Year 2)	Completed	Yes
PP4	Volunteer Creek Clean Ups	PP-4: Whether or not clean up day is organized, sampling locations are identified and results are summarized. (Year 3)	Completed - Ongoing	Yes
PP5	City Employee Training	PP-5A: Whether or not a stock presentation was made (Year 2) and total number and percent of City employees with SWMP responsibilities were trained each year.	Completed - Ongoing	Yes

Status of Measurable Goals

Table 1. Status of Measurable Goals

ВМР	Description	Measurable Goal	Sta	ntus
			Staus	On Schedule
		Illicit Discharge Detection and Elimination		
ID1	Enforcement	ID-1A: Develop forms or a format for reporting public complaints or maintenance personnel actions regarding illicit discharges. (Year 1)	Completed - Ongoing	Yes
	Authorities	ID-1B: Revise City's Engineering Standard Details and Specifications to incorporate Attachment 4 design standards. (Year 3)	In Process	No
ID2	Hazardous Materials and Waste Management	ID-2: Develop incident forms (Year 2) and track number of IDDE complaints or actions. (Ongoing)	Completed	Yes
ID3	Storm Drain Mapping	ID-3: Develop storm drain atlas. (Ongoing)	Completed – Ongoing	Yes
	Identification	ID-4A: Inspect target outfalls twice annually. (Ongoing)	Ongoing	No
ID4	and Elimination of Illicit Discharges	ID-4B: Identify source of pollutants of target outfalls. (Year 4)	Not Applicable	
		ID-4C: Respond to IDDE complaints within 24-hours. (Ongoing)	Ongoing	Yes
ID5	Education and Outreach	ID-5: Develop and illegal dumping and illicit connection brochure. (Year 2)	Completed	Yes
ID6	Illicit Discharge Ordinance	ID-6: Develop an Illicit Discharge Ordinance. (Year 3)	In Process	No
ID7	Illicit Discharge Comprehensive Ordinance Review	ID-7: Review other existing ordinances for opportunity to reduce Illicit Discharges. (Year 3)	In Process	No
		Construction Site Storm Water Control		
	Develop Storm	CS-1A: Track the # and % of projects receiving a grading permit. (Year 3).	Completed - Ongoing	Yes
CS1	water Pollution Prevention Inspection	CS-1B: Track the # and % of projects inspected resulting in enforcement actions. (Year 3)	Completed - Ongoing	Yes
	Program	CS-1C: Track the # of repeat offenders and types of offenses. (Ongoing)	Completed - Ongoing	Yes
CS2	Revise Grading Ordinance	CS-2: Revise the grading ordinance. (Year 4)	In Process	Yes
CS3	Adoption of Existing BMP Manuals	CS-3 Adopt construction site BMP manuals. (Year 3)	Completed	Yes
CS4	Construction Outreach and Information Materials	CS-4: Track the # of brochures distributed annual and % of applicants receiving the brochures. (Ongoing)	Ongoing	Yes

Status of Measurable Goals

Table 1. Status of Measurable Goals

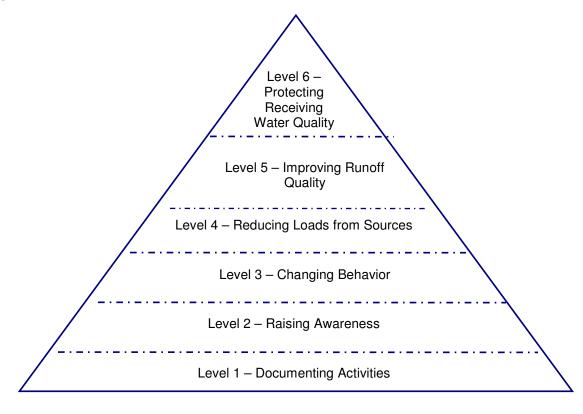
BMP	Description	Measurable Goal	Sta	ntus
			Staus	On Schedule
		Post-Construction Strom Water Management		
	PC-1A: Annually inspect all completed projects implementation of post construction runoff controls. (Ongoin		Not Completed	No
PC1	Policies in the General Plan	PC-1B: Amend the City Standard Detail and Specifications to include attachment 4 criteria and a Low Impact Development Design Manual. (Begin Year 2, complete in Year 4)	In Process	No
		PC-2A: Evaluate all City-funded project designs for consistency with MEP standards. (Ongoing)	Not Applicable	
	0. 5	PC-2B: Inspect the performance of all City-funded projects for proper function. (Ongoing)	Not Applicable	
PC2	City Policy and Process Revisions	PC-2C: Track number of enforcement actions taken on conditioned project and the time to take corrective steps to resume work. (Ongoing)	Ongoing	Yes
		PC-2D: Develop post construction storm water control design standards and revise the Construction Guideline of the City's Standard Details and Specifications to be consistent with LID Design manual and attachment 4. (Year 3)	In Process	No
PC3	Development	PC-3A: Prepare a post-construction draft ordinance that complies with Attachment 4 standards. (Year 2)	In Process	No
P03	Requirements	PC-3B: Establish a tracking program of innovated projects designed to protect/improved water quality (Ongoing)	Completed	Yes
PC4	Permitting Process	PC-4: Develop a post-construction storm water quality checklist to be used during the plan review process. (Year 2)	Completed	Yes
	Pollutio	on Prevention/Good Housekeeping for Municipal O	perations	
GH1	Facility Maintenance	GH-1: Develop a form to report and randomly conduct inspections of maintenance activities and facilities, twice per Year to verify contractor adherence to City technical specifications. (Year 2)	Completed	Yes
GH2 Integrated Waste Management Association		GH-2: Increase the awareness about waste management by including IWMA's website in City brochures and fact sheets. (Year 3)	Ongoing	Yes
GH3	GH-3: Develop Facility and Maintenance inspection forms and		Completed	Yes
Development of BMP Fact GH-4: By Year 2, one fact sheet will be developed		GH-4: By Year 2, one fact sheet will be developed to address treatment control, or structural control, BMPs. (Year 2)	Completed	Yes
GH5	Employee Training by City Depts.	GH-5: Storm water training will occur either quarterly or annually, depending on personnel involved. (Ongoing)	Completed - Ongoing	Yes

Rating Effectiveness

The General Permit requires the City to assess the appropriateness and effectiveness of the individual Best Management Practices (BMPs) used to achieve the programs goals. In order to do this, the City is using a rating system described in the Municipal Stormwater Program Effectiveness Assessment Guidance manual developed by the California Stormwater Quality Association's (CASQA) to assist permittees in evaluating the progress and effectiveness of their storm water management programs.

This rating system uses outcome levels which refer to the results of a BMP or overall program. Program elements and control measures may have outcomes at more than one of the levels described and not all levels are applicable to all activities. The six outcome levels are shown below.

Figure 1: Classification of Outcome Levels



- Level 1: This level reflects program development and implementation and basic compliance with the General Storm Water Permit requirements.
- Level 2: At this level the target audience's awareness of an issue has been raised through education.
- Level 3: The change in the target audience's behaviors results in the implementation of BMPs.
- Level 4: The outcome is a reduction in the amounts of pollutants associated with specific sources resulting from the implementation of a BMP.
- Level 5: Results in the reduction in one or more specific pollutants.

Level 6: Compliance with water quality standards, protection of biological integrity, and beneficial use attainment.

Minimum Control Measures

The following sections describe the City's progress and assessment of effectiveness of the BMPs for the six required Minimum Control Measures (MCMs) as required under the Reporting Requirements and monitoring section of the General Permit. The BMPs listed in this report are as written in the Revised Storm Water Management Report dated May 6, 2008.

Public Education and Outreach

Additional Activities Implemented

- The City promotes the Our Water Our World program which offers information on less toxic pest management for the home and garden. Two retail stores in the City, Farm Supply and Orchard Supply Hardware, offer fact sheets to customers on less toxic pest control and display shelf talkers for home and garden products approved by the program.
 - 10,000 fact sheets On using less toxic products and promoting "Our Water, Our World" were distributed in the April 2008 utility bill. This information was also printed in the April 2008 edition of the City's newsletter <u>City Pride News</u> which is distributed with the pay checks to all 278 City employees. See Appendix A for a copy of <u>City Pride News</u> and the utility bill insert.
- The Water Department sponsored a Sustainable Landscape Workshop Series which offered a workshop on Drip Irrigation "A Hands on Approach" on June 28, 2008. The announcement for this series was mailed out in the utility bills. This series continues with two additional workshops this

summer. See Appendix A for the workshop announcement.



BMP PE1: Adopt-A-Street Program

i. General Summary

The city promotes a volunteer program aimed to promote community pride while reducing litter on adopted streets. The Adopt-a-Street Program decreases the volume of litter that can enter the waterways and degrade aquatic habitats.

ii. Status of Measurable Goals

<u>PE-1:</u> Maintain the existing program levels and expand the program by at least 25%. The City will provide further information regarding the benefits of protecting water quality to those who adopt streets.

The number of adopted streets dropped from 24 to 22 enrolled streets as of the end of Year 3. This represents an approximately 2% percent decrease in streets adopted during this reporting period.

The City has not been able to achieve an increase of 25% as desired. The Adopta-Street program is a voluntary program which relies on the initiative of individuals, companies, schools or organizations to enroll in the program. While the City has taken efforts to promote the program by listing the program on its web site as one of many potential volunteer activities, providing supplies and public recognition through street signage at adopted street location, the City was unable to increase public participation to the levels desired.

The City began documenting the volume and mass of trash bags collected as part of the Adopt-a-Street program in March 2008. Over the four months recorded, a total of 29 bags of trash were collected weighing a collective 197 pounds. See Table 2 below for a list of adopted streets and the number and weight of bags collected. Appendix A has examples of the Trash Inventory Sheets.

Brochures were sent out in Year 2. However, staff decided that with the limited new enrollees in the program, it was decided to incorporate water quality brochures/fact sheets as part of the Adopt-a-Street program application and conduct volunteer surveys at the end of each fiscal year for all volunteers. Therefore, literature was not provided to the volunteers and the annual surveys were not done.

The City will return to distributing information on the Storm Water Program and will conduct surveys of the volunteers. Providing information to the volunteers will reinforce the importance for the program and serve as a reminder of their commitment to pick up letter on their adopted streets.

iii. Appropriateness

This BMP is highly effective at removing litter and debris dumped along the City streets.

iv. Effectiveness

The reduction in the discharge of pollutants to receiving waters is quantifiable by the volume of debris collected which is consistent with CASQA Level 4: Reducing Loads from Sources.

v. Proposed Modifications

No modifications are proposed

vi. Brief summary of storm water activities planned for the next reporting cycle.

As stated above the City will resume distributing information on the City's Storm Water Program and surveying volunteers to raise awareness of the program and as a reminder to the participants to pick up litter on their adopted streets.

Road	From	To	# of	Lbs.
	5		Bags	
Niblick Road	Bridge	Creston		
Airport Road	Hwy 46 E.	Dry Creek		
North River Road	13th	City limit		
South River Road	13th	Niblick		
South River Road	Niblick	Charolais	1	18
South Vine Street	1st	Cuerno Largo	4	32
South Vine Street	Cuerno Largo	Hwy 46 W.	3	7
Riverside Avenue	4th	13th		
Riverside Avenue	13th	24th	5	43
Theatre Drive	Hwy 46 W.	City limit		
Golden Hill Road	Creston	Union	2	3
Rolling Hills Road	Creston	Golden Hill	1	5
Union Road	N. River	Golden Hill		
Union Road	Golden Hill	City limit		
Experimental Station	Buena Vista	City limit		
Charolais Road	S. River	Creston		
Creston Road	S. River	Rolling Hills		
Creston Road	Rolling Hills	Scott	1	6
Creston Road	Scott	City limit		
Spring Street	24th	36th		
Dallons Dr	Buena Vista	Golden Hill		
Navajo Pathway			12	83
TOTAL			29	197

BMP PE-2: Web Site

i. General Summary

The City's storm water web page provides information on the City's Storm Water Program, water quality issues, educational materials on preventing storm water pollution, and a method to comment or ask questions on the storm water program as well as a form to report illegal discharges.

ii. Status of Measurable Goals

<u>PE-2:</u> Maintain and track the number of hits to the existing web page and add additional storm water program information before the end of Year 2. The City will continue update the web page with additional information as it is developed.

The storm water web page was updated and expanded in May 2008 to include additional pages for Public Education and Construction which include relevant brochures, fact sheets which can be downloaded and links to relevant sites. Additional pages for illicit discharge and Post Construction will also be expanded. The web site can be found at:

http://www.prcity.com/government/departments/publicworks/stormwater/swmp.asp

The web site hits this reporting period increased by 1,576 hits. This is a 30% increase in web site hits between the second reporting year and the current reporting year. See Table 3 below.

iii. Appropriateness

The web site is appropriate for a wide variety of community members including: businesses, community groups, schools, and citizens. The web site can be accessed by businesses and citizens of all ages to look up information on how to reduce or eliminate storm water pollution and eliminate non-storm water discharges. It also allows people to comment or ask questions, or report illegal discharges for those who prefer not to talk to a live person.

iv. Effectiveness

This BMP is consistent with CASQA Level 2: Raising Awareness due to the increased number of website "hits".

Table 3. Sto	Table 3. Storm Water Web Page Hits					
Month	2006-2007	2007-2008				
July	141	489				
August	178	451				
September	227	294				
October	358	279				
November	275	334				
December	379	283				
January	464	323				
February	110	402				
March	410	382				
April	265	684				
May	535	859				
June	399	537				
Total	3,741	5,317				

v. Proposed Modifications

No modifications are proposed.

vi. Brief summary of storm water activities planned for the next reporting cycle.

The City will continue to update and expand the storm water web page and monitor and record web site hits on a monthly basis. The web site's address will be included on all City storm water brochures/fact sheets.

BMP PE-3: Brochure and Fact Sheets

i. General Summary

Brochures and fact sheets are developed and distributed by the City to educate the community on ways they can prevent storm water pollution and non-storm water discharges. The brochures highlight water quality problems, identify pollutants of concern and provide examples of practices that can eliminate or reduce the pollutant of concern from entering the storm drain system.

ii. Status of Measurable Goals

<u>PE-3A:</u> Distribute a general storm water fact sheet to all residents in their utility billing.

A watershed brochure, "Help Prevent Storm water Pollution and Keep SLO County Beautiful" featuring Sammy the Steelhead was distributed to 10,000 residents in Year 2. This brochure continues to be handed out at public events. Approximately 70 of these brochures were handed out this past year.

An additional brochure on storm water pollution, "Help Stop Storm Water Pollution" was developed in April 2008. Approximately 15 of these brochures were distributed with Notice of Violations. The brochure is available on the City's storm water web page and will be handed out at future public events. See Appendix A for a copy of this brochure.

<u>PE-3B:</u> Develop a storm water brochure for construction contractors describing the City's BMPs for minimizing runoff from construction sites (Year 2).

A construction outreach brochure was developed in Year 2 as required and is distributed to all construction projects. The brochure was handed out with all 26 grading permits issued this reporting Year and is also on the storm water web page.

<u>PE-3C:</u> Develop an English/Spanish storm water brochure for local businesses including information on specific pollution prevention measures businesses can employ to minimize storm water pollution and urban runoff.

The City developed three different brochures targeting businesses this past year.

- A business outreach brochure "Preventing Strom Water Pollution at Your Business!" was created and mailed to 1,244 businesses on June 20, 2008. This brochure covered various subjects such as pressure washing, washing off outside areas and general BMPs for preventing storm water pollution. This brochure was added to the City's storm water web page. These brochures were not translated into Spanish because the City has not found that there is a need.
- A brochure targeting pressure washing was developed in April 2008. Ten of these brochures were distributed with Notice of Violations. This brochure is also available on the storm water web page.
- The last brochure, "Fog, Storm Water, and Your Restaurant!" was developed in

April 2008 for food establishments. The City began conducting Fats, Oils, and Grease (FOG) inspections as part of the Pretreatment Program in June 2008. This brochure was handed out at ten FOG inspections.

See Appendix A for copies of the brochures.

<u>PE-3D:</u> Develop an illicit discharge fact sheet or brochure that describes the City's illicit discharge detection and elimination program.

An illicit discharge brochure was developed and distributed to 10,000 residents in Year 2 as required.

iii. Appropriateness

The City has created brochures/fact sheets that are targeted towards specific audiences. These brochures/fact sheets are available on the storm water web page and distributed to businesses, developers/homeowners, food establishments during pretreatment inspections, and recipients of storm water related notices of violations, and handed out at public events.

iv. Effectiveness

Brochures and fact sheets are an effective tool for educating residents and business owners about the City's Storm Water Program and the water quality issues such as pressure washing and sewage overflows caused by grease blockages. Currently the City is keeping track of the number of brochures distributed (CASQA Level 1: Documenting Activities). It is expected that the brochures will ultimately result in a decrease of water quality-related violations (CASQA Level 3: Changing Behaviors).

v. Proposed Modifications

No modifications are proposed.

vi. Brief summary of storm water activities planned for the next reporting cycle.

The City will continue to develop and revise brochures and fact sheets to meet the specific needs of the storm water program and will continue to promote the Our Water, Our World Program.

BMP PE-4: Storm Water Hotline

i. General Summary

The City provides a storm information line to allow the community to report illegal discharges, clogged storm drains, or request information on the storm water program. The reporting party information can be anonymous in an effort to encourage City residents to report problems to the City when they see them.

ii. Status of Measurable Goals

<u>PE-4:</u> The City will provide a hotline number that residents and businesses and construction contractors can call to get information on the Storm Water Program,

report water quality issues, or get other information.

The City had previously used the Storm Water Pollution Prevention Hotline which was developed by the San Luis Obispo County Partners for Water Quality. In April 2008 the City installed a new phone system and created a designated Storm Water Information Line as part of the upgrade (805-227-7240). The phone is

If you witness somebody discharging anything to a storm drain or waterway, please call the City of Paso Robles at 227-7240 (or 788-Fish for reporting discharges outside of the City of Paso Robles).

staffed during normal work hours and callers may leave a message after hours. The number is currently promoted on the City's storm water web site and recently created brochures. The number will also be listed in the phone book and be included in new brochures and fact sheets the City develops. Since the installation of the line, three calls have been received.

ii. Appropriateness

The storm water information line is available for those who do not have access to the internet or who prefer talking to a real person to obtain storm water information or to report a storm water concern. Receiving reports of illicit discharges on this line allows City staff to respond immediately which can result in preventing or eliminating the illicit discharge from reaching the storm drain system.

iii. Effectiveness

The number of phone calls received is a measure of "raising community awareness" of the Storm Water Program and water quality issues and currently meets CASQA Level 1 Outcome: Documenting Activities. The City believes that the number of calls received will increase as the phone number is advertised on brochures and listed in the phone book.

iv. Proposed Modifications

No modifications are proposed.

vi. Brief summary of storm water activities planned for the next reporting cycle.

The City will continue to promote the storm water information phone number.

BMP PE-5: Storm Drain Marking

i. General Summary

Using markers and stencils to mark the storm drain inlets raises public awareness that the storm drain inlets flow directly to the waterways without treatment. The City has been working towards marking all storm drain inlets with the help of volunteers.

ii. Status of Measurable Goals

<u>PE-5</u>: Begin marking each storm drain inlet within the City by the end of Year 3. Continue to mark storm drain inlets until they are all marked.

The City estimates that there are approximately 799 drain inlets. Some of these drain inlets are in areas, such as traffic lanes, and cannot be labeled.) Volunteers

with the Girl Scouts and Boy Scouts marked 300 storm drains in Years 2 and 3. City staff placed another 100 markers in Year 3. (Approximately 50% of the storm drain inlets have been marked.) The City has ordered additional storm drain markers to mark the remainder drains.

iii. Appropriateness

Storm drain markers and stencils are highly visible source controls that remind the public that storm drains flow directly to a waterway.

iv. Effectiveness

The City meets CASQA effectiveness rating Level 2: Raising awareness

v. Proposed Modifications

No modifications are proposed.

vi. Brief summary of storm water activities planned for the next reporting cycle.

The City will continue marking drain inlets throughout the next two Years with an emphasis on the most densely populated neighborhoods.

BMP PE-6: Event Participation

i. General Summary

The City promotes its' Storm Water Program and water quality by staffing interactive booths and distributing educational materials at various community events throughout the Year.

ii. Status of Measurable Goals

<u>PE-6:</u> The City will participate in local public events and distribute information about the Storm Water Program at the events.

The City participated in the five events described below during the 2007/2008 reporting period:

Farm and Ranch Expo -_Approximately 1,000 people attended this Expo at Downtown City Park on July 21, 2007 from 9 am to 3 pm. About 20% of the attendees stopped by the City's booth where information was provided regarding illicit discharge, integrated pest management (Our Water Our World), and ways that individuals can prevent storm water pollution.

Fishing Derby - Over 100 children and 50–60 adults participated in the Fishing Derby on April 12, 2008 at the lake at Barney Schwartz Park. The City distributed storm water brochures and had a handson demonstration of how a small quantity of oil can contaminate local water and negatively affect marine life.





Home and Recreation Show - Over 20,000 people attended this two day event on April 26–27, 2008 at the Paso Robles Event Center (Mid-State Fairgrounds). Brochures, pencils, coloring books and other small toys were distributed, along with fact sheets about storm water quality preservation and water conservation. The City teamed up with Atascadero Mutual Water Company, the City of San Luis Obispo, and the County of San Luis Obispo for this event.

Farmers Market - Staff reserved space at the Downtown Farmers' Market on three dates: October 23, 2007, April 22, 2008 and June 10, 2008. Attendance averaged 100–200 people. Integrated Pest Management brochures, illicit discharge fact sheets, and hotline phone number notepads were distributed. Brochures on the "10 Steps to Prevent Storm Water Pollution" were also distributed.



WaterFest - The second annual WaterFest in San Luis Obispo County took place at the Atascadero Sunken Gardens on May 3, 2008. In addition to participating in the event by having a booth, the City was also a sponsor and provided \$500 cash to help defray costs. Nearly 2,000 people, including at least 500 children, participated and learned about our critical local water resources. The event surpassed last Year's inaugural WaterFest held in San Luis Obispo by reaching substantially more people and engaging a wider variety of educational exhibits.

Teachers, representing 55 classrooms, participated prior to the event through in-class water education activities. Thirty-five exhibitors offered hands-on educational games with clear messages about implementing good storm water practices at home. At least 250 youth completed a WaterFest Activity Passport, nearly a ton of old electronics were gathered for recycling by 1800GOTJUNK, and *Teens At Work* removed a dozen bags of trash from nearby Atascadero Creek.



See Appendix A for photos of Public Events.



<u>PE6-B</u>: Develop a storm water display for public events.

The City created a 72" x 30" mobile presentation board with information on how to prevent storm Water pollution.

iii. Appropriateness

Public event participation increases community knowledge and awareness of the storm water program and water quality issues. Events such as WaterFest draw a large number of people where the importance of protecting water quality is the main emphasis and the information is delivered in a fun and relaxing atmosphere.

iv. Effectiveness

Participating in public events is consistent with CASQA Level 2: Raising Awareness.

v. Proposed Modifications

No proposed modifications.

vi. Brief summary of storm water activities planned for the next reporting cycle.

The storm water mobile presentation board will be updated and revised to include current information such as the Storm Water Information line.

Table 4. Public Education and Outreach

BMP	Description	Measurable Goal			Stat	tus			
			Implemented	On Schedule	Exceeded	Modified	Effective	Not Effective	Unknown
PE1	Adopt-A-Street Program	PE-1: Track the # and % of increase in streets adopted and the # of water quality brochures/fact sheets distributed to those who adopt streets. (Ongoing)	Yes /No	Yes /No		X	X		
PE2	Storm Water Web Site	PE-2: Track the number of web site hits.	Yes	Yes			X		
	Brochures and Fact Sheets	PE-3A: Complete watershed fact sheet for all residences (Year 2) and distribute fact sheet in utility bills.	Yes	Yes			X		
PE3		PE-3B: Develop construction outreach brochure and distribute to all SWPPP required construction projects. (Year 2)	Yes	Yes					x
		PE-3C: Develop business outreach brochure. (Year 3)	Yes	Yes	X		X		
		PE-3D: Develop and distribute illicit discharge brochures at public events/meetings, display IDE brochure at City office. (Year 2)	Yes	Yes					х
PE4	Storm Water Hotline	PE-4: Establish a storm water program hotline. (Year 2)	Yes	Yes			X		
PE5	Storm Drain Marking PE-5: Mark all storm drain inlets with "don't dump, drains to river" markers. (Year 3)		Yes	Yes			X		
PE6	Event Participation	PE-6: Identify local public events suitable for storm water information distribution (Year 1). Participate in local public events suitable to distribute storm water information. (Year 2/ongoing)	Yes	Yes			X		

Public Involvement and Participation

Additional Activities Implemented

 The City's Water Education Program included 17 presentations on water conservation to 3rd - 6th grade. See BMP PP-2B and Table 6 for a list of the presentations.

BMP PP-1: Public Meetings

i. General Summary

The City will holds public meetings to update the community and City Council on the progress being made towards achieving the goals defined in the City's SWMP.

ii. Status of Measurable Goals

<u>PP-1A</u>: The City will hold a public meeting to present the SWMP to the community, City Council, and other City Departments and to receive comments on the draft program.

This meeting was held as scheduled during the Year 1 reporting period.

<u>PP-1B</u>: The City will hold two public meetings over the course of the next five Years to update the community, City Council and City Departments on the progress of the storm water program (Years 2 & 4).

The first meeting was held on schedule during the Year 2 reporting period. There was no public meeting required for this reporting period.

iii. Appropriateness

Holding public meetings to update the community and City Council on the progress being made towards achieving the goals defined in the City's Storm Water Management Plan (SWMP), provides a forum to discuss and receive input on the storm water program.

iv. Effectiveness

This BMP meets CASQA effectiveness level 2: Raising Awareness because it allows the public the opportunity to comment and take part in the Storm Water Program.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The second public meeting will be scheduled during the next reporting period.

BMP PP-2: Public Presentations

i. General Summary

Public presentations are designed to engage the community, in the need for and the benefits of the Storm Water Program and SWMP.

ii. Status of Measurable Goals

<u>PP-2A</u>: The City will prepare a "stock presentation" that informs the community about the need for and the benefits of the storm water program and SWMP.

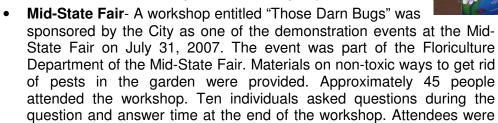
The City completed a stock presentation in Year 2. An updated stock presentation was completed in May 2008 by a contractor. The presentation is a general overview of the history and requirements of the storm water program and can be used for all audiences.

<u>PP-2B</u>: The City will modify the stock presentation to focus on a specific community stakeholder. The City will conduct five presentations per year to community groups.

The City did not modify the stock presentation for specific stockholders. Instead the City presents the stock power point presentation as a background of the Storm Water Program and staff then discusses the specific concerns of the stakeholders at the presentation.

The City exceeded its goal of providing five presentations to various community groups.

• Senior Citizens Community Center – A presentation on "Our Water, Our World" (OWOW) was given to approximately 30 people at the Paso Robles Senior Center on October 1, 2007. This program provides information on less toxic pest management for the home and garden. OWOW handouts were given out to the group.



encouraged to meet with the presenters after the workshop, and to take home the brochures provided.

• Water Education Program – The City hired a contractor to develop a water education program and provide presentations to 3rd through 6th grade classes on storm water and water conservation. The storm water presentation uses two story boards designed by the contractor to help inform students of potential pollutants found in their homes and how each student could prevent these products from contaminating local creeks, waterways and the ocean. The storm water presentation was given to 22 classes in the Paso Robles Public Schools. Additionally, 17 water conservation classes were given. See Table 5 below for the location of the presentations and the grade levels.

See Appendix B for photos of presentations.

iii. Appropriateness

Public presentations provide an opportunity to engage the community in the need for and the benefits of the Storm Water Program and educate them on specific ways that they can help protect water quality. Because presentations are usually tailored to a specific audience or water quality issue, the information is usually well received. School programs for elementary children are an excellent method to help develop long-term habits that can prevent storm water pollution and raise the awareness water quality. Children also share the information with their families which is an added benefit which cannot be measured.

iv. Effectiveness

This BMP is consistent with CASQA Level 2: Raising Awareness. The effectiveness of school presentations is not easily measured because it is meant to form long-term habits in protecting water quality and water conservation. Public presentations that are specific to a certain audience, such as gardeners or a business group can create support for the program by understanding the importance and the goals of the program.

v. Proposed Modifications

The City will not modify the stock power point presentation for specific stockholders. Instead the City presents the power point presentation as a background of the Storm Water Program and then discusses the specific concerns of the stakeholders.

vii. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue the class room presentations as well as presentations to community groups including the business associations such as the Chamber of Commerce and the Main Street Association.

Table 5. Water Education Program

City of Paso Robles 2007-08 School Year				
Date	Program	School	Grade	
9/21/07	Water Conservation	Pifer	4th	
9/21/07	Water Conservation	Pifer	4th	
9/21/07	Water Conservation	Pifer	4th	
10/10/07	Storm Water	Kermit King	4th	
2/15/08	Water Conservation	Kermit King	3rd	
2/15/08	Water Conservation	Kermit King	3rd	
2/15/08	Water Conservation	Kermit King	3rd	
2/22/08	Storm Water	Kermit King	3rd	
<i>2/22/08</i>	Storm Water	Kermit King	3rd	
2/22/08	Storm Water	Kermit King	3rd	
<i>2/25/08</i>	Storm Water	Bauer Speck	5th	
<i>2/25/08</i>	Storm Water	Bauer Speck	5th	
<i>2/26/08</i>	Storm Water	Kermit King	5th	
2/26/08	Storm Water	Kermit King	5th	
<i>2/26/08</i>	Storm Water	Kermit King	5th	
<i>2/28/08</i>	Storm Water	Pat Butler	5th	
2/28/08	Storm Water	Pat Butler	5th	
3/05/08	Storm Water	Bauer Speck	5th	
3/07/08	Water Conservation	Bauer Speck	5th	
3/07/08	Water Conservation	Bauer Speck	5th	
3/07/08	Water Conservation	Bauer Speck	5th	
4/04/08	Storm Water	Pifer .	5th	
4/04/08	Storm Water	Pifer	5th	
4/04/08	Storm Water	Pifer	5th	
4/25/08	Water Conservation	Pat Butler	5th	
4/25/08	Water Conservation	Pat Butler	5th	
4/25/08	Water Conservation	Georgia Brown	5th	
4/25/08	Water Conservation	Georgia Brown	5th	
5/21/08	Storm Water	Daniel Lewis	6 th	
5/21/08	Storm Water	Daniel Lewis	6 th	
5/21/08	Storm Water	Daniel Lewis	6 th	
5/21/08	Storm Water	Daniel Lewis	6th	
5/21/08	Storm Water	Daniel Lewis	6 th	
5/21/08	Storm Water	Daniel Lewis	6 th	
5/21/08	Storm Water	Daniel Lewis	6 ^{tn}	
5/30/08	Water Conservation	Virginia Peterson	3 rd	
5/30/08	Water Conservation	Virginia Peterson	3rd	
5/30/08	Water Conservation	Virginia Peterson	3rd	
5/30/08	Water Conservation	Virginia Peterson	3rd	

BMP PP-3: Web Page

i. General Summary

The City has a storm water web page which gives the community access to information about the City's Storm Water Program, educational materials

and links to related web sites. The web page also gives citizens a method to report clogged storm drains, comment on the program and anonymously report illegal discharges and spills.

ii. Status of Measurable Goals

<u>PP-3</u>: The City will include a comment form as part of the City's web page in Year 2 of the program and respond to comments as necessary.

The City used the general comment/suggestion form for the City's web site to solicit comments during the Year 2. The City did not receive any comments on the storm water program. Therefore a program-specific comment form was created in June 2008 to encourage web site users to comment and ask questions on the storm water program. No comments or questions were received.

iii. Appropriateness

An increasing number of citizens and businesses have access to the Internet. Providing a web site allows those groups and individuals access to materials about storm water issues and the SWMP.

iv. Effectiveness

This BMP is consistent with CASQA Level 1: Documenting Activities.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The city will continue to track comments or questions received through the comment form.

BMP PP-4: Volunteer Creek Clean Ups

i. General Summary

Creek clean up programs are designed to educate the public on the importance of protecting water quality by involving volunteers in the collection of trash, junk, and debris which demonstrates importance of not littering and properly disposing of trash and debris.



ii. Status of Measurable Goals

<u>PP-4:</u> The City will organize a volunteer-based creek clean-up day in the fall of Year 3 and continue these clean-up days. The City will identify sampling locations for water quality sampling before and after the clean-up day.

The City participated in the County-wide Creek Day on Saturday, September 29, 2007. The event was held at Larry Moore Park which is adjacent to the Salinas River. Over 70 volunteers participated, including members of Boy Scout Troop #60, students from Paso Robles High, Liberty High, Atascadero High, and Trinity Lutheran School. Awards were given to the youngest and oldest participant as well as for the most unusual trash found. Volunteers removed a 30-yard dumpster (est. 2 tons) which included shopping carts, old bicycles, 23 rubber tires, a mattress, a metal barrel, scrap metal and barbed wire and 3 bins (est. 75 pounds) filled with recyclable materials. See Appendix B for photos and the utility bill insert that was sent out in August 2007 and

Water quality samples were samples were taken before and after the event at two locations (upstream and downstream of the clean up area). The samples were tested for pH, suspended solids, electrical conductance, total organic carbon and turbidity. The results did not demonstrate significant improvements in the water quality as expected, however, the purpose of this sampling event is primarily educational.

iii. Appropriateness

Creek clean up day demonstrates to volunteers the importance of properly disposing of litter, trash, and debris to keep it out of our waterways.

iv. Effectiveness

Creek clean up day is creates public awareness of keeping gross pollutants out of the waterways and is quantifiable by the volume of debris collected. This BMP is consistent with CASQA Level 2: Raising Awareness and Level 4: Reducing Loads from Sources.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue to participate in and promote County-wide Creek Day.

BMP PP-5: City Employee Training

i. General Summary

City staff need to set an example for the public by preventing non-storm water discharges and eliminating storm water pollution from municipal operations.

ii. Status of Measurable Goals

<u>PP-5:</u> The City will modify the "stock presentation" to focus on an overview of each of the minimum control measures in Year 2 of the program.

City staff received training twice in Year 2. Public Works staff including, managers, supervisors, and administrative assistants were shown the new power point "stock presentation" of the City's storm water program on May 23, 2008 as a reminder of the program's requirements.

On June 6, 2008, 35 Public Works staff from 8 departments received training specifically on municipal operations and how to prevent storm water pollution. (See Table 6 below.) Instead of modifying the stock presentation a commercially produced DVDs was shown which covered maintenance issues such as good housekeeping in storage yards, cleaning and fueling equipment, proper clean up methods of spills and fertilizer application. Each employee was given a pre and post test to evaluate understanding of the material presented. Overall test scores improved indicating an increased awareness. See Appendix B for examples of pre and post tests.

Managers and Supervisors included: the Director of Public Works, Supervisor of Streets and Parks, Supervisor of Fleet and Building Maintenance, Events and Project Manager, Capital Improvements Engineer, Wastewater Supervisor, and the Superintendent of Maintenance Services.

Table 6. Storm Water Training	7
Department Division	# of Staff
Buildings Maintenance	1
Fleet Maintenance	1
Streets	4
Parks	4
Water	5
Wastewater	10
Administrative Assistants	3
Managers/Supervisors	7
Total	35

In addition to the training sessions above, staff with specific responsibilities in the storm water program received additional training at workshops, short courses or EPA web casts. Table 7 lists the staff and the trainings attended. The City's CIP Engineer completed a Pervious Concrete Certification Program. See Appendix B for a copy of the certificate.

Table 7. A	Table 7. Additional Staff Training					
Staff Person	Position/Responsibility	Training				
Patti Gwathmey	Industrial Waste Manager (Storm Water Program Administrator)	 Reining in the Rain – LID Workshop (April 2008) EPA Webcast: Assessing the Effectiveness of your Storm Water Program EPA Webcast: The Art & Science of Storm Water Retrofitting (April 2008) 				
John Falkenstien	City Engineer	 Reining in the Rain – LID Workshop (April 2008) 				
Ditas Esperanza	Capital Projects Engineer	 Reining in the Rain – LID Workshop (April 2008) Completed training to be a certified as a pervious Concrete Technician. EPA Webcast: The Art & Science of Storm Water Retrofitting (April 2008) 				
Mike Bruce	Water Resource Specialist (Storm Water Inspector)	 24 hour, Construction Water Pollution Control training StormCon, Preventing Storm Water Pollution on Construction Sites 				

iii. Appropriateness

Many positions in the City are involved in municipal operations that could create non-storm water discharges or storm water pollution. Training staff on the importance of the City's storm water program and implementing BMPs that can prevent storm water pollution in their daily job duties is crucial to the City setting an example for the community.

iv. Effectiveness

The outcome of this BMP is CASQA Level 2: Raising Awareness through the use of pre and post class tests.

Proposed ModificationsNo modifications proposed. V.

Briefly summarize the storm water activities you plan to undertake during the next reporting cycle. vi.

City staff will continue to receive annual training.

Table 8. Public Participation and Involvement.

ВМР	Description	Measurable Goal	Status						
			Implemented	On Schedule	Exceeded	Modified	Effective	Not Effective	Unknown
224	Public Meetings	PP-1A: Whether or not a public meeting was held prior to SWMP approval. (Year 1)	Yes	Yes			X		
PP1	rublic Meetings	PP-1B: Whether or not a public meeting was held during Year 2 and 4 of SWMP implementation period.	Yes	Yes			X		
PP2	Public Presentations	PP-2A: Completion of stock presentation.	Yes	Yes	X		X		
PPZ	Fublic Fresentations	PP-2B: 5 public presentations held per Year.	Yes	Yes	X	X	X		
PP3	Web Page	PP-3: Whether or not a comment form is included on the City's web page. (Year 2)	Yes	Yes					х
PP4	Voluntary Crock Cloop RP 4: Whether or not cloop up day is ergenized, compling locations are		Yes	Yes			X		
PP5	Event Participation	PP-5: Whether or not a stock presentation was made (Year 2)and total number and percent of City employees with SWMP responsibilities were trained each Year.	Yes	Yes		x	x		

Illicit Discharge Detection and Elimination

Additional Activities Implemented

The City implemented additional activities to reduce and eliminate illicit discharges this reporting period.

- Storm Water Staff began issuing Notice of Violations in March 2008 to the responsible party for illicit discharges to the storm drain system. A table of the types and numbers of the Notice of Violations is shown under ID-4C. Examples of Notice of Violations are in Appendix C.
- The City began conducting pretreatment inspections at food facilities in June 2008 for Fats, Oils, and Grease (FOG) and storm water issues. An inspection form is used which includes violations for both FOG handling and storm water discharges. The FOG program requires all food facilities to install grease interceptors in order to reduce the amount of grease accumulating in the City's collection system and sanitary sewer overflows as a result of the grease blockages. See Appendix C for an example of an inspection report.

A brochure was created for food facilities "FOG, Storm Water and Your Restaurant!" which lists BMPs for both grease handling and Storm Water. See Appendix A for a copy of this brochure.

 The City contracts with Paso Robles Waste Disposal to provide curbside pick up of used oil for residents. This service is listed on the City's web site at:

http://www.prcity.com/government/departments/publicworks/trash-recycling/faq.asp#oil

BMP ID-1: Enforcement Authorities

i. General Summary

The city encourages the public to report illegal discharges, spills, and runoff from construction sites by providing a separate storm water information phone line and a form on the storm water web page to anonymously report incidents.

ii. Status of Measurable Goals

<u>ID-1A</u>: The City will develop forms or a format for reporting public complaints or maintenance personnel actions regarding illicit discharges.

A reporting form for the public to report illicit discharges was designed in Year 1 and is available on the city's storm water web page. Only 1 citizen

complaint was received during the past Year off of the web site. City employees have been directed to notify the City Storm Water Inspector directly by phone or e-mail so the response to the complaint is not delayed.

Three illicit discharges were reported by City staff, one resulted in a notice of violation being issued for discharge of pressure washing into the storm water system, while the other two incidents were minor and resulted in a warnings only. The City expects that the public will begin to use the designated storm water information line to report illicit discharges as this number is advertised on new brochures and on the web site.

<u>ID-1B:</u> The City's Engineering Standard Details and Specifications will be revised in Year 3 to address the Design Standards included within Attachment 4 of the General Permit.

In May, the City hired a consultant to review the Engineering Standard Details and Specifications, for compliance with Attachment 4 criteria. The City will be updating and revising this document in conjunction with the development and adoption of the Low Impact Development Design Manual.

iii. Appropriateness

ID-1A: The reporting form developed in Year 1 is intended to provide the general public with an additional method of reporting illicit discharges.

ID-1B: Including Attachment 4 requirements in the Engineering Standard Details and Specifications will ensure that the City projects or private projects in the City right-of-way will be compliant with the General Permit.

iv. Effectiveness

ID-1A: Recording the number of incidents reported using the reporting form is consistent with CASQA level 1: Documenting storm water program activities.

1D-1B: Revising the Standard Details and Specifications is consistent with CASQA level 4: Reducing Loads from Sources, because attachment 4 provides specific source control design criteria for projects on the City property or private projects within the City right-of-way or (as defined in Attachment 4).

v. Proposed Modifications

The City would like to consolidate similar BMPs into one BMP. The City would like to change the title of this BMP from Enforcement Authority to IDDE Complaint Investigation and Response. This BMP would have ID-1A (Developing forms or format to receive complaints) and ID-2 (complaints from the Fire and Police Departments) and ID-4C (responding to complaints within 24 hours included). The complaint form on the web site for the public would remain, however, the complaint form for the Police

(Code Enforcement) and Fire Departments and staff is not the best method for reporting illicit discharges or spills. Since the City has a designated storm water inspector, having reports made by phone or e-mail instead of a form and keeping a log of these complaints would allow staff to respond quicker and possibly eliminate the illicit discharge.

BMP ID-1B and ID-7 are redundant. Both of these BMPs involve revising City's Engineering Standard Details and Specifications. Both of these BMPs discuss reviewing the Engineering Standard Details and making revisions to them to address non-storm water discharges and illicit discharges. The City would like to have just one BMP for revising the Engineering Standard Details and Specifications under BMP ID-7.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue to track the number of complaints of illicit discharges or spills received from the public and staff. The City will revise the City Engineering Standard Details and Specifications to incorporate Attachment 4 criteria and any other necessary revisions required for the adoption of a Low Impact Development Design Manual.

BMP ID-2: Hazardous Materials and Waste Management

i. General Summary

Develop and distribute hazardous materials and waste management incident forms to City Department of Emergency Services, the Fire Department, Integrated Waste Management Authority and Paso Robles Waste disposal.

ii. Status of Measurable Goals

<u>ID-2:</u> The City will develop forms or a format for reporting incidents involving hazardous waste, liquid waste, spills, etc. that could pollute storm water.

Forms were developed in Year 2 as required. The City's Fire Department did not have any incidents that reached a storm drain or water way.

City Code Enforcement, which is part of the Police Department, referred two complaints to storm water staff during this reporting period.

- A complaint of an overflowing private sewer lateral. It was determined that the sewage was contained on the private property and did not reach the storm drain system. The owner of the property was sent Notice of Violation to clear the blocked lateral and keep it in good operating condition.
- Code Enforcement responded to an illegal discharge of water and latex paint to the storm drain. The responsible party was directed to clean up the gutters and educated on the proper disposal of paint waste and clean-up water.

iii. Appropriateness

Storm Water staff have found the using forms to report illegal discharges to the storm drain system delays response time to complaints. Additionally, Paso Robles Waste Disposal and Integrated Waste Management Authority do not normally act in a capacity as reporting entities for storm water violations.

iv. Effectiveness

Tracking the number of illegal discharges that the Fire Department and Code Enforcement reports is consistent with CASQA level 1: Documenting Activities.

v. Proposed Modifications

As stated above, this BMP is a complaint related BMP which would be a better fit under ID-1 which was proposed to be changed to include all illicit discharge complaint actions related to developing complaint forms, procedures and response.

This particular BMP would be reworded to include the Fire Department and Police Department and would report discharges to the storm drain system. Integrated Waste Management Authority (IWMA) and Paso Robles Waste Disposal would be removed since neither of these organizations normally work in the capacity of making complaints. Therefore, this BMP would focus on tracking complaints from the City's Police (Code Enforcement) and Fire Departments. This BMP would track all complaints, not just those received on the complaint form. A log would be kept of all complaints.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue to track complaints received from Code Enforcement and the Fire Department.

BMP ID-3: Storm Drain Mapping

i. General Summary

The development of a map of the storm drain system will aid the City in tracing illicit discharges and non-storm water flows.

ii. Status of Measurable Goals

<u>ID-3</u>: The storm drain mapping effort will begin in Year 1 and will be completed by Year 4.

The City created a storm water map identifying drain inlets, outfalls, and storm drain pipes in January 2005. Storm water staff has determined that this map is not 100% accurate. To ensure that the storm drain system map is accurate, the Storm Water Inspector walked the Salinas River and all the

tributaries, including man-made channels, in the City limits to identify all outfalls. A total of 188 outfalls were identified and inspected. (71 more outfalls than reported last Year.) Each outfall was photographed and its location identified using Global Positioning System (GPS). The locations of 797 drain inlets were also confirmed using an existing Geographic Information System (GIS) program and field checks for accuracy.

This information will be downloaded onto a map by the City's GPS Analyst. City employees will be able to view the pictures of the outfalls by clicking on an outfall. This map will be made into a storm water system atlas to be used by field staff.

iii. Appropriateness

Storm water mapping is a crucial tool for tracing illicit discharges or spills in the storm drain system back to the source, preventing discharges from reaching a waterway, and determining sources of pollution at outfalls.

iv. Effectiveness

An accurate storm drain map can be an effective tool for tracing illicit discharges and for preventing discharges from reaching the waterways. Therefore, this BMP has the potential to reduce impacts to receiving water and it is consistent with CASQA Level One: Documenting Activities and when used for preventing an illicit discharge from reaching a waterway is consistent with CASQA Level 4: Reducing Loads from Sources.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The 2005 storm drain atlas does not include all of the storm drain manholes and direction of flow. The storm drain manholes in the missing areas will be mapped using GPS and direction of flow of the drains will be added this coming year.

BMP ID-4: Identification and Elimination of Illicit Discharges

i. General Summary

Identifying and inspecting targeted outfalls and upstream culverts and drain inlets and helps the City to determine sources of storm water pollution and non-storm water discharges.

ii. Status of Measurable Goals

<u>ID-4A</u>: Inspect targeted outfalls within the City on a routine basis of twice per year with follow-up inspections as appropriate to ensure abatement of violations.

City of Paso Robles 2007-2008 Annual Report Illicit Discharge Detection and Elimination

The previous annual report listed 61 targeted outfalls. The targeted outfalls on the list had not been inspected prior to March 2008, when the current Storm Water staff were assigned to the program. At that time, the list of targeted outfalls was reviewed and it was determined that some of the listed outfalls were actually storm water conveyances under roads.

It was decided by staff as part of the storm drain mapping and inspection effort, that a new list of targeted outfalls would be made. Staff did not feel that all of the outfalls previously listed on the previous list were of a concern. The new list contains 20 targeted outfalls. See Table 9 below.

Although the targeted outfalls did not get inspected twice, the storm water staff inspected all 188 outfalls located in the City and completed an outfall inspection form for each one. A list of outfalls which need some type of work such as tree or debris removal has been made. This list will be discussed with the Streets Supervisor who will determine the work to be done on the outfalls. See Appendix C for examples of outfall inspection forms.

The inspections did not identify any illicit discharges from City outfalls. However, three illicit discharges were found that were not actually in City outfalls.

- A discharge of plaster that had been washed out of a mixer onto the bank of the Salinas River from a stucco business. A Notice of Violation was issued to the owner. The owner cleaned up the dried stucco.
- A discharge from auto detailing at an auto body shop into the Salinas River. The owner was contacted and instructed to cease the discharge. He was instructed to install a clarifier and connect to the sanitary sewer. The owner complied and completed the work under a building permit.
- A discharge of slurry from a company that polishes granite was found in a man-made channel. The company owner was instructed to cease the discharge. The owner immediately changed the company's procedure and cleaned up the slurry in the channel.

Table 9.	Targeted Outfalls	
Outfall #	Location	Reason
1	East of Highway 101, North of treatment plant	Significant Flow
3	Highway 46 East and Highway 101	Significant Flow
12	13th Street and Paso Robles St	Significant Flow
13	11th and Garden St	Sulfur Discharge
38	Niblick and Salinas River	Significant Flow
29	Highway 46 West and Ramada	Significant Flow
49	North River Rd and Union	Significant Flow
44	South River Rd and Salinas River	Significant Flow
124	Niblick Rd and South River Rd	Significant Flow
140	Rambouillet and Moody Ct	Significant Flow
118	Rambouillet and Stoney Crk	Significant Flow
17	North Highway 101 and Niblick Rd	Significant Flow
34	River Bank and Bridgegate	Significant Flow
56	North River Rd and River Oaks Rd	Significant Flow
83	Oxen and Brahma	Significant Flow
106	Cedarwood and Ebony	Significant Flow
107	Cedarwood and Teak	Significant Flow
108	Cedarwood and Beechwood	Significant Flow
64	4th Street and Peachtree	Significant Flow

<u>ID-4B</u>: Identify culverts and/or drain inlets upstream of targeted outfalls which appear to be a potential source for discharging pollutants. (Year 4)

The inspection of the outfalls did not show any illicit discharges or spills. The outfalls on the targeted list are considered high risk due to their proximity to the Salinas River or because of the amount of flow.

<u>ID-4C</u>: Respond to illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice. (Year 2)

Storm water staff responded to all complaints and referrals with 24 hours of receiving the complaint during normal working hours. If an actual illicit/illegal discharge to the storm drain system has taken place, the responsible party is issued a Notice of Violation on site. If the responsible party continues the practice, a second NOV is issued in the form of a letter.

Staff received 3 complaints from March 12, 2008 until June 30, 2008. 15 Notice of Violations and 1 letter were issued during this time. The Storm Water Inspector discovered the other violations while driving through the downtown area. Table 10 below shows the number and types of violations

issued.

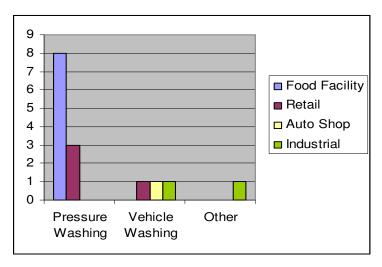


Table 10. Types of Notice of Violations

iii. Appropriateness

Inspecting culverts and drain inlets upstream of outfalls with signs of illicit discharges can help determine the source of the discharges. Responding to complaints in a timely manner can reduce the impact on the storm water system or prevent pollutants from entering the waterways as well as educating the responsible party about storm water pollution.

iv. Effectiveness

ID-4A: Inspections of targeted outfalls are currently at CAQA Level 1: Documenting Activities

ID-4C: Responding to complaints of illicit discharges, educating the responsible party and issuing Notice of Violations is consistent with CASQA Level 2: Raising Awareness and CASQA Level 3 Changing Behaviors. The City feels that Level 3 is accurate since a local pressure washer purchased recycling equipment after receiving a Notice of Violation in order to be able to work in the City of Paso Robles.

v. Proposed Modifications

BMP ID-4C, responding to complaints within 24 hours, would be moved under ID-1 which will be changed from Enforcement Authority to IDDE Complaint Investigation and Response. ID 1 would also have ID-1A (Developing forms or format to receive complaints) and ID-2 (complaints from the Fire and Police Departments) included. ID-4 would be focused on targeted outfalls and investigating sources of pollution upstream.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will inspect all target outfalls twice during the next reporting year.

BMP ID-5: Education and Outreach

i. General Summary

Illicit discharges often occur because of a lack of awareness. Brochures can educate homeowners and businesses about illicit discharges, the impacts to the discharges to the storm water system and suggestions/best management practices that can be used to eliminate the illegal discharge.

ii. Status of Measurable Goals

<u>ID-5</u>: The City will develop an illegal Dumping and Illicit Connections brochure in Year 2.

The City developed a brochure in Year 2 as required. Four additional brochures for specific types of illicit discharges were developed this reporting period which exceeds the measurable goal for this BMP.

- "Help Stop Storm Water Pollution!" was developed in April 2008. Approximately 15 of these brochures have been distributed with Notice of Violations. The brochure is available on the City's storm water web page and will be handed out at future public events.
- "Best Management Practices for Power Washing" was developed in April 2008. 10 of these brochures were distributed with Notice of Violations. This brochure is available on the City's storm water web page.
- "Preventing Storm water Pollution at your Business!" This brochure was mailed to 1,244 businesses on June 20, 2008 as required under PE-3C. This brochure covered various subjects such as pressure washing, washing off outside areas and general BMPs for preventing storm water pollution. This brochure is also available on the City's storm water web page.
- "FOG, Storm Water, and Your Restaurant!" was developed in April 2008 for food establishments. The City began an inspection program for Fats, Oils, and Grease (FOG) in June 2008. This brochure was handed out at ten FOG inspections.

The City provides the brochure which is pertinent to the violation along with the Notice of Violation for illicit discharges. See Appendix A for copies of the brochures.

iii. Appropriateness

Creating and distributing informative brochures for homeowners and businesses about illicit discharges and water quality is effective. Distributing brochures with NOVs gives the responsible party alternative

methods of performing the task without discharging to the storm drain system or waterway.

iv. Effectiveness

The City is currently at CASQA Level 2: Raising Awareness by handing out the brochures with Notice of Violations.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue to create brochures for specific topics as the need arises.

BMP ID-6: Discharge Ordinance

i. General Summary

A Discharge Ordinance will clearly define the City's prohibitions on nonstorm water discharges and storm water pollution.

ii. Status of Measurable Goals

<u>ID-6</u>: The new ordinance will be drafted in Year 2 and finalized in Year 3. Existing ordinances and Standard Details and Specifications will be reviewed and revised as necessary to address non-storm water discharges.

The Discharge Ordinance was not adopted by City Council in Year 3 as planned. Adopting the Discharge, Post Construction and Grading Ordinances, as well as the LID Design Manual will be a priority in Year 4. The three draft ordinances will be reviewed for consistency with each other.

The City does have a Municipal Code Section that prohibits illegal discharges to waterways and is currently using this section in Title 14 of the City's Municipal Code to issue Notice of Violations for illegal discharges to the storm drain system. Section 14.08.020(B) states "It is unlawful to discharge to any stream or watercourse any sewage, industrial wastes or other polluted waters, except where suitable treatment has been provided in accordance with provisions of this or other applicable agency codes."

iii. Appropriateness

A discharge ordinance will better define the City's storm water prohibitions and enforcement authority.

iv. Effectiveness

The City is currently at CASQA Level 1: Documenting if a discharge ordinance has been written.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will review the draft ordinance for consistency with the draft Post Construction and Grading Ordinances, submit it to the City Attorney for review and go through the public review process for adoption by the City Council.

BMP ID-7: Illicit Discharge Comprehensive Ordinance Review

i. General Summary

Review the Illicit Discharge Ordinance in relation to other City Ordinances to ensure that there is consistency.

ii. Status of Measurable Goals

<u>ID-7:</u> The City will conduct a review of existing ordinances in Year 3 and the Engineering Standard Details and Specifications to determine if any revisions are necessary to specifically address non-storm water discharges and illicit discharges.

The current Grading Ordinance will be revised in Year 4 and will address non-storm water discharges and illicit discharges when applicable. The Sewer Ordinance is also in the process of being revised. A water quality section will be added to the Engineering Standard Details and Specifications to address non-storm water discharges and illicit discharges on City projects or private projects on City right-of-way.

iii. Appropriateness

To provide clear, consistent direction, the new discharge ordinance must be consistent with all municipal codes.

iv. Effectiveness

The BMP meets CASQA Level 1: Documenting Activities.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The Engineering Standard Details and Specifications, Grading Ordinance and the Sewer Ordinance have been reviewed and will be revised.

Table 11. Illicit Discharge Detection and Elimination

ВМР	Description	Measurable Goal	Status						
			Implemented	On Schedule	Exceeded	Modlfied	Effective	Not Effective	Unknown
ID1	Enforcement	ID-1A: Develop forms or a format for reporting public complaints or maintenance personnel actions regarding illicit discharges. (Year 1)	Yes	Yes			x		
	Authorities	ID-1B: Revise City's Engineering Standard Details and Specifications to incorporate Attachment 4 design standards. (Year 3)	No	No					
ID2	Hazardous Materials and Waste Management	ID-2: Develop incident forms (Year 2) and track the number of IDDE complaints or actions. (Ongoing)	Yes	Yes			х		
ID3	Storm Drain Mapping	ID-3: Develop a storm drain atlas. (Ongoing)	Yes	Yes			X		
	Identification and	ID-4A: Inspect target outfalls twice annually. (Ongoing)	Yes	No			X		
ID4	Elimination of Illicit	ID-4B: Identify source of pollutants of target outfalls. (Year 4)	Yes	Yes					
	Discharges	ID-4C: Respond to IDDE complaints within 24-hours (Ongoing)	Yes	Yes	Х		X		
ID5	Education and Outreach	ID-5: Develop and illegal dumping and illicit connection brochure. (Year 2)	Yes	Yes	X		X		
ID6	Illicit Discharge Ordinance	ID-6: Develop an Illicit Discharge Ordinance. (Year 3)	Yes	No					х
ID7	Illicit Discharge Comprehensive Ordinance Review	ID-7: Review other existing ordinances for opportunity to reduce Illicit Discharges.	Yes	Yes					х

Construction Site Storm Water Control

Additional Activities Implemented

• The City worked with the Upper Salinas-Las Tablas Resource Conservation District and San Luis Obispo County Planning and Building Department to hold a workshop on Erosion Control for Contractors, Engineers, Developers, & Planners. This course was designed to provide contractors with effective and easily achievable methods to reduce soil erosion from construction sites and development projects. See Appendix D for the information sheet and photos.

BMP CS-1: Develop City Storm Water Pollution Prevention Inspection Program

i. General Summary

Sites that are greater than or equal to 1 acre or less than 1 acre that are part of a larger project are required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and must submit a SWPPP checklist certifying that the plan meets the requirements. Sites are inspected during the grading and building phases for compliance with the SWPPP. Sites less than 1 acre must have and Erosion and Control Plan and are inspected for compliance with the plan.

ii. Status of Measurable Goals

<u>CA-1A:</u> # and % of projects receiving a grading permit (Year 3), ranked by size of overall project (between 1 and 5 acres, and greater than 5 acres).

The Building Department issued 26 grading permits. 7 projects (26%) of the grading permit applicants were required to submit a SWPPP and SWPPP checklist to the City. Out of the 7 projects, 5 were between 1 and 5 acres and two were over 5 acres.

<u>CA-1B:</u> # and % of projects inspected resulting in enforcement actions taken for noncompliance with the SWPPP, Grading Ordinance, or Erosion Control Plan and the type of enforcement taken. (Year 3)

The City did not note any violations for storm water compliance for projects that were 1 acre or larger in size. The number of grading permits issued has dropped significantly from previous years and grading of the projects being done in the dry months could be the reason why no violations were noted. The inspections at these sites were not tracked in a manner in which the type of inspection, (grading, storm water, etc.), could be counted. Therefore it could not be determined how many grading inspections were conducted. This will be corrected in Year 4.

In addition to inspections at sites that are greater than or equal to 1 acre, the City's Building Department also inspects projects less than one acre in size for storm water violations and for compliance with the Erosion Control Plan during the building process. The Building Inspectors conducted over 3800 site inspections. There were 9 storm water complaints received and various storm water violations noted. The inspectors conducted on site inspections, contacted the contractor and required the violations to be corrected immediately. The City will develop a system to track the number of storm water violations at sites less than 1 acre in size.

<u>CA-1C:</u> # of repeat offenders as well as the increase or decrease of enforcement actions taken and types of offenses.

There were no repeat offenders for projects 1 acre in size or larger.

iii. Appropriateness

Construction sites are common sources of storm water pollution. Inspecting sites for compliance with the SWPPP and Erosion and Control Plan can eliminate construction site runoff which is a common source of pollutants such as sediments.

iv. Effectiveness

This BMP is consistent with CASQA Levels 1 through Level 4. All construction sites are inspected for storm water runoff and required to correct any storm water violations. This reduces the loads from construction sites and makes contractors more aware of storm water requirements.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will develop a system for tracking grading inspections and storm water violations, and continue to document the # of projects requiring a SWPPP and the # and % of projects inspected resulting in enforcement actions. If enforcement actions are taken, the # and types of offenses will be documented. The City will also develop a method for tracking storm water violations for building sites less than 1 acre in size.

BMP CS-2: Revise Grading Ordinance

i. General Summary

The City's grading ordinance will be revised to ensure that proposed projects adhere to attachment 4 criteria and the LID Manual.

ii. Status of Measurable Goals

<u>CS-2:</u> Continue revising the grading ordinance to include references to the General Construction Permit, Attachment 4 requirements, and the LID Manual.

In Year 2 a draft Grading Ordinance was developed using a template. However, the City's current grading ordinance is more comprehensive than the draft ordinance and includes requirements specific to the City. Therefore, the City will review and revise the current Grading Ordinance to include Attachment 4 requirements and references to the LID Design Manual and the State's General Construction Permit.

iii. Appropriateness

The most effective means to prevent storm water pollution is to control it at the site during grading and after it is built. Ensuring that the City's grading ordinance requires proposed projects follow the State Construction Permit and adhere to attachment 4 criteria is expected to reduce the long term water quality impacts associated with development.

iv. Effectiveness

Revising the current grading ordinance to incorporate attachment 4 criteria and reference the LID Design Manual, expected to Reduce Loads from Sources, (CASQA level 4).

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will be updating and revising the Grading Ordinance in conjunction with the development and adoption of the Low Impact Development Design Manual and will include references the State Construction Permit and Attachment 4. As stated previously, adopting the revised Ordinances and the LID Design Manual in Year 4 is a priority.

BMP CS-3: Adoption of Existing BMP Manuals

i. General Summary

Adopting commonly accepted construction best management practices manuals will help permit applicants prepare SWPPPs and Erosion and Control Plans.

ii. Status of Measurable Goals

<u>CS-3</u>: Adopt construction site BMP Manuals in Year 3. The adopted manuals will be referenced in the revised Grading Ordinance and links will be provided on the City's web site and construction handouts.

The City adopted the current versions of the Caltrans Construction Site Best Management Practices Handbook and the California Stormwater Quality Association's Construction Best Management Practices Manual. A reference to the manuals will be included in the revised Grading Ordinance and there are links on the City's storm water web page to both manuals at:

http://www.prcity.com/government/departments/publicworks/stormwater/swmp-construction.asp

iii. Appropriateness

Having a uniformly accepted standard for construction site BMPs will provide applicants with a clear understanding of expected BMPs and will allow construction site inspectors to become familiar with BMP details.

iv. Effectiveness

Adopting the manuals is consistent with CASQA Level 1.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

A reference will be included in the Grading Ordinance to the current versions of the Caltrans Construction Site Best Management Practices Handbook and the CASQA Construction Best Management Practices Manual.

BMP CS-4: Construction Outreach and Information Materials

i. General Summary

The City prepared a construction handout in Year 2. This handout is given to all grading permit applicants.

ii. Status of Measurable Goals

<u>CS-4:</u> Prepare construction community outreach/information materials. Beginning in Year 2, provide City construction contractors and developers with construction BMP Brochures and materials for distribution to permit applicants. The City will record the number of informational brochures/materials distributed to construction staff, as well as the percent of applicants receiving and/or using the brochures.

The City distributed the construction outreach materials to all 26 grading permit applications (100%). The construction outreach materials are also available on the City's storm water web site listed in BMP CS-4.

iii. Appropriateness

Distributing construction outreach materials to grading permit applicants will give a clear understanding of expected site performance.

iv. Effectiveness

This BMP consistent with CASQA Level 2: Raising Awareness. The Construction outreach materials are intended to ultimately reduce loads from sources (CASQA level 4).

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue to track the number of brochures distributed annual and % of applicants receiving the brochures during this reporting period. The brochures will be updated as the need arises.

Table 12. Construction Site Storm Water Control

ВМР	Description	Measurable Goal	Status						
			Implemented	On Schedule	Exceeded	Modified	Effective	Not Effective	Unknown
	Develop a City Storm	CS-1A: Track the # and % of projects receiving a grading permit. (Year 3)	Yes	Yes			Х		
CS1	Water Pollution Prevention Inspection	CS-1B: Track the # and % of projects inspected resulting in enforcement actions. (Year 3)	Yes	Yes			х		
	Program	CS-1C: Track the # of report offenders and types of offenses	Yes	Yes			Х		
CS2	Revise Grading Ordinance	CS-2 Revise the grading ordinance. (Year 4)	No	No		X			
CS3	Adoption of Existing BMP Manuals	CS-3 Adopt construction site BMP manuals. (Year 3)	Yes	Yes					Х
CS4	Construction Outreach and Information Materials	CS-4: # of brochures distributed annual and % of applicants receiving the brochures. (Ongoing)	Yes	Yes					х

Post-Construction Storm Water Management

BMP PC-1: Land Use Policies in the General Plan

i. General Summary

Post Construction storm water facilities usually consist of a series of collection and conveyance systems, detention/retention basins, and or treatment facilities such as a clarifier. A maintenance program is essential to ensure that these facilities continue to function as designed.

ii. Status of Measurable Goals

<u>PC-1A:</u> Annually inspect all completed projects for implementation of post construction runoff controls. (Ongoing)

The City requires post construction runoff controls on all projects that are 1 acre or greater in size. These devices are inspected during construction as part of the building permit. There are currently 3 facilities with post construction runoff controls, two underground retention basins and one detention basin. The other post construction control devices are on projects that have not been developed.

The City has not inspected the post construction controls that have been built nor does it have the authority or staffing to inspect such devices on private property. The City would like to modify this BMP as described below to have a self-certification program for post construction devices.

PC-1B: Post construction requirements as identified in attachment 4 of the General Permit will be included in a Post Construction Storm Water Ordinance. The Post Construction Storm Water Ordinance will address certain types of discretionary development projects (Year 4).

A draft Post Construction Ordinance has been written but was not adopted in Year 3 as planned. The City is currently in the process of developing a LID Design Manual that will identify additional projects that will be subject to LID requirements in addition to the attachment 4 requirements. The draft Post Construction Ordinance will be revised to include references to the LID Design Manual once it is adopted.

Although the City has not adopted a Post Construction Ordinance, the City does require post construction treatment controls on new development. Grading permit applicants are required to submit Project Information Sheet which lists the post construction runoff controls that the project will have. (See PC 4.) Additionally, the City Engineer notes on all conditionally approved projects that Low Impact Development should be used. See Appendix E for an example of a Project Information Sheet.

iii. Appropriateness

Post construction measures are known to reduce the impacts of development to

receiving waters. The Post Construction Ordinance will clearly define the Attachment 4 requirements and other LID requirements that the City develops.

iv. Effectiveness

The City is currently at CASQA Level 1: Documenting if the program is being implemented

v. Proposed Modifications

The City would like to modify PC-1A as follows: A self-certification program for post construction runoff controls on private property will be developed and the authority to require the annual certifications included in the Post Construction Ordinance (Year 4). A form will be developed and sent to the responsible party. Annual certifications will be required to be completed by the property owners or their agents for the inspection and maintenance of post construction devices prior to the rainy season. The City will report the number of post construction runoff controls installed and the number of certifications received (Year 5).

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle

The City will continue to require post construction devices to be installed on all new proposed projects and will inspect any post construction storm water controls while under construction through the building permit inspection program. The City will develop the annual self-certification program for post construction devices.

BMP PC-2: City Policy and Process Revisions

i. General Summary

This BMP is intended to have the City projects include post construction devices.

ii. Status of Measurable Goals

<u>PC-2A</u>: Evaluate all City funded projects for construction and implementation of water quality control measures through the term of the permit.

The City did not design or construct any projects that required post-construction measures in this reporting Year.

<u>PC-2B</u>: Evaluate all City funded projects on a yearly basis for proper functioning and maintenance of water quality measures through the term of the permit.

No post-construction measures have been incorporated into City projects since the SWMP was approved. Therefore there are not any facilities to inspect.

<u>PC-2C</u>: Track the number of enforcement actions taken on conditioned projects such as correction notice, stop work order, and collection of any bonds, and the time frame for developer to take corrective steps to resume work through the term of the permit (Ongoing).

There were no enforcement actions taken on conditioned projects this reporting

year.

<u>PC-2D</u>: Revise the Construction Guidelines of the City's Standard Details and Specifications to be consistent with LID Design manual which will include the provisions in Attachment 4 of the General Permit.

In May 2008 the Engineering Standard Details and Specifications was reviewed for consistency with Attachment 4. A water quality section will be added into this document that will include any necessary references to Attachment 4 and LID measures. It should be noted that the Engineering Standard Details and Specifications pertain only to work done on City owned property or private projects in the City right-of-way.

iii. Appropriateness

The intent of PC-2A and 2B is to ensure that City projects include post construction devices. However, the City has not built any projects that these types of devices would be included nor are there any large Capital Improvement Plans scheduled for the next two Years. While it is appropriate to expect the City to include post construction devices to protect water quality, the lack of planned Capital Improvement Projects (CIP) makes these BMPs inappropriate. Furthermore, PC-2D, revising the construction standards in the Engineering Standard Details and Specifications to include requirements for Attachment 4 and the LID Design Manual would ensure that City funded projects have water quality control measures. Since this document pertains only to City owned property or private projects within the City right-of-way.

PC-2C is related to the construction process and not related City funded projects or post construction. Additionally it is redundant of CS-1 (tracking the # and % of enforcement actions). Therefore, this is not an appropriate BMP for Post construction.

PC-2D is appropriate. Revising the construction standards in the Engineering Standard Details and Specifications to be consistent with Attachment 4 is important. Since the Engineering Standard Details and Specifications are projects in the City right-of-way, these revisions would ensure that post construction runoff controls would be included on City funded projects.

iv. Effectiveness

The effectiveness of PC-2A and 2B cannot be rated since there are no City facilities with post construction runoff controls.

PC-2C: is consistent with CASQA Level 1: Documenting Activities.

v. Proposed Modifications

BMPs PC-2A and 2B are not effective BMPs. The City does not have plans for any CIP projects and as stated above, if the Engineering Standard Details and Specifications are revised to include requirements for Attachment 4 and the LID Design Manual, this would ensure that City funded projects would have water quality control measures. The City proposes replacing this BMP with a new one that would require contractors hired for City funded construction projects to submit a storm water and illicit discharge plan to the CIP Engineer prior to the start of work, regardless of size. This plan would consist of a form developed by the City

for the contractor to describe how they will control storm water pollution, non-storm water discharges and how they will handle illicit discharges. The City would track how many plan received, how many storm water or illicit discharge violations noted at City funded sites. This would be BMP ID-5.

BMP PC-2C is not related to City funded projects nor is it related to post construction. As stated above, this BMP is related to construction and is redundant of CS-1 (tracking the # and % of enforcement actions). Therefore, this information is collected in CS-1. This BMP should be eliminated.

PC-2D is related to designing, installing and maintaining post construction runoff controls at City funded projects. The wording of other post construction BMPs listed are for tracking storm water violations on private projects. Modifying the Engineering Standard Details and Specifications will ensure that the City enforces storm water/water quality requirements on City owned projects. This BMP will remain under BMP-2.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will revise the construction standard in the Engineering Standard Details and Specifications, to be consistent with Attachment 4 requirement and LID measures that the City adopts.

BMP PC-3: Development Requirements

i. General Summary

Develop post construction storm water control ordinance that identifies and requires City design standards consistent with the LID Design Manual and provisions in Attachment 4.

ii. Status of Measurable Goals

<u>PC-3A</u>: Prepare a draft ordinance in Year 2 to include the requirement to implement Low Impact Development as required for Attachment 4 in the General Permit and not already addressed in other revisions to City policies and ordinances.

The City prepared a draft post construction storm water ordinance in year 2. However, the City is in the process of developing and adopting a LID Design Manual and will revise the draft post construction ordinance to include that Attachment 4 requirements and references for the LID Design Manual once it is adopted. The City will adopt the post construction ordinance in conjunction with the adoption of the LID Design Manual.

<u>PC-3B</u>: Establish a tracking program of innovative projects designed to protect/improve water quality.

The tracking sheet was posted on the City's storm water web site to make it more accessible to the public. There have not been any hits on this page since it was posted in April 2008. Of the 5 projects that are listed only three of the projects have been completed; The Ford Dealership, Coastal Crop care, and Davis

Apartments. Two of these facilities installed underground retention basins and the other installed a retention basin.

iii. Appropriateness

PC-3A is appropriate to give the City the authority to enforce the Attachment 4 requirements and to ensure the LID Design Manual is followed.

iv. Effectiveness

PC-3A is currently at CASQA Level 1: Documenting if the program is being implemented.

PC-3B is not effective. Underground retention basins and detention ponds are not considered innovative storm water controls. These types of controls are very common and are not good examples of innovative projects. Furthermore, the BMP requires the City to take photos of the facility in operation. It is not possible to photograph an underground device.

v. Proposed Modifications

PC-3B should be modified to develop a tracking system of post construction devices to ensure that they are annually certified.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will incorporate the requirement for Attachment 4 requirements and place a reference to the LID Design Manual into the draft Post Construction ordinance and will adopt the ordinance.

BMP PC-4: Permitting Process

i. General Summary

Developing a post construction storm water quality checklist for use during the plan review process will help to assure that post construction storm water quality standards are being applied consistently and address the projects pollutants of concern.

ii. Status of Measurable Goals

<u>PC-4</u>: Develop a post construction storm water quality checklist that will be utilized by developers and track the number of permit application that are returned or rejected due to insufficient assessment of the project's impacts on storm water quantity and quality or due to inadequate inclusion of post construction controls for storm water.

A Project Information Sheet must be submitted with every grading permit application for sites greater than or equal to 1 acre. This sheet collects information on the type of project, planned BMPs, and Post Construction BMPs. No projects were returned out of the 7 grading permits issued for not having adequate BMPs. If storm water runoff will have a negative effect on water quality or neighboring properties, the project does not receive a permit until satisfactory storm water

controls are included on the plans. See Appendix E for examples of the Project Information Sheet.

iii. Appropriateness

A post construction storm water quality checklist can help assure that post construction storm water quality standards are being applied consistently.

iv. Effectiveness

The City is currently at CASQA Level 1: Documenting if the program is being implemented.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue tracking the number of permit applications returned or rejected.

Table 13. Post-Construction Storm Water Management

BMP	Description	Measurable Goal	Status						
			Implemented	On Schedule	Exceeded	Modified	Effective	Not Effective	Unknown
	Land Use Policies in	PC-1A: Annually inspect all completed projects for implementation of post construction runoff controls. (Ongoing)	No	No					
PC1	the General Plan	PC-1B: Amend the Engineering Standard Details and Specifications to include attachment 4 criteria and a Low Impact Development Design Manual. (Begin Year 2, complete Year 4)	Yes	No					х
		PC-2A: Evaluate all City-funded project designs for consistency with MEP standards. (Ongoing)	Yes	Yes					X
		PC-2B: Inspect the performance of all City-funded projects for proper function. (Ongoing)	Yes	Yes					X
PC2	City Policy and Process Revisions	PC-2C: Track number of enforcement actions taken on conditioned project and the time to take corrective steps to resume work. (Ongoing)	Yes	Yes					х
		PC-2D: Develop post construction storm water control design standards and revise the Construction Guideline of the City's standard Details and Specifications to be consistent with LID Design manual and Attachment 4. (Year 3)	Yes	No					
PC3	Development	PC-3A: Prepare a post-construction draft ordinance that complies with Attachment 4 standards. (Year 2)	Yes	No					
FC3	Requirements	PC-3B:: Establish a tracking program of innovated projects designed to protect/improved water quality. (Ongoing)	Yes	Yes				X	
PC4	Permitting Process	PC-4: Develop a post-construction storm water quality checklist to be used during the plan review process (Year 2) and track the # and% of projects returned/rejected based on inadequate post-construction storm water quality controls. (Ongoing)	Yes	Yes			x		

Pollution Prevention/Good Housekeeping for Municipal Operations

BMP GH-1: Facility Maintenance

i. General Summary

Conduct random inspections, using in house inspection forms, of contractors working on city projects to determine potential storm water problems.

Status of Measurable Goals

GH 1: Beginning in Year 2, randomly conduct inspections, twice yearly, to verify contractor adherence to City technical specifications for landscape maintenance, street sweeping, litter control, etc.

The City has greatly reduced the number of maintenance contracts due to budget reasons. Three inspections were conducted on contractors while performing maintenance services, fertilizer application, turf maintenance and rehabilitation of pumps at three wastewater lift stations. There were no corrective actions noted during the inspections. See Appendix F for contractor evaluations.

ii. Appropriateness

The General Permit requires the city to examine its own activities.

iii. Effectiveness

The City is currently at CASQA Level 1: Documenting if the program is being implemented.

iv. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

The City will continue to inspect maintenance activities conducted by contractors.

BMP GH-2: Integrated Waste Management Association

i. General Summary

The City supports and promotes the SLO County Integrated Waste Management Authority (IWMA) Recycling and Household Hazardous Waste Programs through brochures, fact sheets and training.

ii. Status of Measurable Goals

GH-2: By Year 3, increase the awareness about waste management by including IWMA's website in City brochures and fact sheets and in training programs for City employees.

The City developed the brochure "Help Stop Storm Water Pollution!" this reporting period. This brochure lists IWMA's web site and their phone number for information on the proper disposal of chemical, paints, car fluids and fertilizers at a household hazardous waste facility. See Appendix A for a copy of this brochure. A link to IWMA's web site has also been place on the City's storm water web page.

iii. Appropriateness

Integrated Waste Management Authority is an appropriate resource for the City to promote because the goals are complimentary to storm water system awareness.

iv. Effectiveness

The City is currently at CASQA Level 1: Documenting if the program is being implemented. Although the City promotes IWMA website, it is not possible to document that this BMP is effective in increasing awareness of the programs ran by IWMA.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

A brochure for City employees will be developed which will include IWMA's web site and information on the proper disposal of household hazardous waste.

BMP GH-3: Facility Surveys

i. General Summary

The City operates a wide variety of facilities such as offices, community centers, parks, public pools and maintenance yards. The facilities are inspected to determine if existing practices need to be revised to eliminate storm water pollution or non-storm water discharges.

ii. Status of Measurable Goals

GH-3: In Year 2, develop a Facility and Maintenance Inspection form and conduct 2 facility inspections and evaluate two maintenance activities. Beginning in Year 3, inspect each City facility annually and evaluate two maintenance activities per year.

The Facility and Maintenance form was developed in Year 2 as required. This form was revised this reporting period to be more applicable to the City's facilities. 14 City facilities were inspected in March 21, 2008. Table 14 lists the facilities inspected See Appendix F for examples of facility inspections.

Three maintenance activities performed by City staff were evaluated to determine if staff used the proper precautions to prevent storm water pollution or non-storm water discharges. Operations evaluated were turf maintenance, tree trimming and

a water leak repair. City staff followed procedures to prevent storm water pollution. See Appendix F for examples of maintenance activity evaluations.

iii. Appropriateness

Inspecting city facilities to determine if existing practices need to be revised to eliminate impacts to receiving waters is consistent with the General Permit requirements to examine the City's own activities and develop a program to prevent the discharge of pollutants from these activities.

iv. Effectiveness

Facility inspections can raise awareness levels of facility staff and reduce loads from sources (CASQA level 2: raising awareness).

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

City facilities will be inspected prior to the wet season to allow adequate time to take appropriate measure prior to the rainy season.

Tab	Table 14. Facility Inspections						
	Facility	Location	Deficiencies Noted				
1.	Administrative Services	Pine St.	No				
2.	Barney Schwartz Park	Union Rd.	Yes				
3.	Centennial Park (Pools)	Nickerson Dr.	Yes				
4.	City Hall	Spring St.	No				
5.	Fleet Maintenance	Riverside Ave.	No				
6.	Larry Moore Park	RiverbankLn.	No				
7.	Municipal Pool	28 th St.	No				
8.	Oak Creek Park	Cedarwood Dr.	Yes				
9.	Pioneer Park	Riverside Ave	No				
10.	Senior Center	Scott St.	No				
11.	Sherwood Park	Creston Rd.	Yes				
12.	Streets Department	Paso Robles St.	Yes				
13.	Turtle Creek Park	Brookhill Dr	No				
14.	Water Yard	Paso Robles St.	No				

BMP GH-4: Development of BMP Fact Sheets

i. General Summary

Develop BMP Fact Sheet to address treatment control.

ii. Status of Measurable Goals

GH-4: By Year 2, one fact sheet will address treatment control, or structural control BMPs. City staff will assess the number and percentage of the targeted City facilities that are implementing the local treatment BMPs annually.

BMP Fact Sheets were developed during reporting Year 2 as required.

Staff use temporary devices such as waddles or sand bags to protect drain inlets and using dechlorination devices when testing fire hydrants in order to protect water quality.

Plans have been approved to construct a Decant Station at the Wastewater Treatment Plant to wash out the street sweeper and the Wastewater's Combination Sewer truck. The station will be a concrete pad that drains to the headworks of the plant. Construction is to begin in September 2008.

iii. Appropriateness

Ensuring that City staff implement BMPs in municipal operations is important in preventing non-storm water discharges and preventing storm water pollution.

iv. Effectiveness

City staff implementing BMPs is consistent with CASQA Level 4: Reducing Loads from Sources.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

City staff will continue to implement the appropriate BMPs to prevent storm water pollution.

BMP GH-5: Employee Training by City Departments

i. General Summary

Annual training provides staff a reminder of the importance of the City's Storm Water Program and how to implement the appropriate BMPs that will protect water quality.

ii. Status of Measurable Goals

GH-5: Beginning in Year 3, storm water training will occur either quarterly or annually, depending on the personnel involved.

Thirty-eight Public Works staff were shown the power point presentation on the City's storm water program on May 23, 2008.

Thirty-five Public Works staff received training on the City's Storm Water Program in June 6, 2008. Table 15 shows the breakdown of the different divisions that received training. Pre and post test were given to staff. Results indicate that attendees learned retained the information provided. Managers and Supervisors included: the Director of Public Works, Supervisor of Streets and Parks, Supervisor of Fleet and Building Maintenance, Events and Project Manager, Capital Improvements Engineer, Wastewater Supervisor, and the Superintendent of Maintenance Services. See Appendix B for examples of Pre and Post Tests.

Table 15. Storm Water Training

Department Division	# of Staff
Buildings Maintenance	1
Fleet Maintenance	1
Streets	4
Parks	4
Water	5
Wastewater	10
Administrative Assistants	3
Managers/Supervisors	7
Total	35

Additionally, City staff with greater responsibilities in the storm water program received additional training as shown in Table 16 below. The City's CIP Engineer completed a Pervious Concrete Certification Program. See Appendix B for a copy of the Certification.

iii. Appropriateness

Training staff from each department at appropriate levels benefits all departments in understanding the importance of storm water and the requirements of the City to comply with the General Permit.

iv. Effectiveness

Raising awareness level of City Staff (CASQA Level 2: raising awareness) based on comparison of pre and post training tests.

v. Proposed Modifications

No modifications are proposed.

vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.

A brochure will be made up for City staff on how to prevent storm water pollution in the work place.

Table 16.	Additional Staff Train	ing
Staff Person	Position/Responsibility	Training
Patti Gwathmey	Industrial Waste Manager (Storm Water Program Administrator)	 Reining in the Rain – LID Workshop (April 2008) EPA Webcast: Assessing the Effectiveness of your Storm Water Program EPA Webcast: The Art & Science of Storm Water Retrofitting (April 2008)
John Falkenstien	City Engineer	 Reining in the Rain – LID Workshop (April 2008)
Ditas Esperanza	Capital Projects Engineer	 Reining in the Rain – LID Workshop (April 2008) Completed training to be a certified as a pervious Concrete Technician. EPA Webcast: The Art & Science of Storm Water Retrofitting (April 2008)
Mike Bruce	Water Resource Specialist (Storm Water Inspector)	 24 hour, Construction Water Pollution Control training StormCon, Preventing Storm Water Pollution on Construction Sites

Table 17. Pollution Prevention/Good Housekeeping for Municipal Operations

ВМР	Description	Description Measurable Goal			Sta	atus			
			Implemented	On Schedule	Exceeded	Modified	Effective	Not Effective	Unknown
GH1	Facility Maintenance	GH-1: Develop a form and randomly conduct inspections of maintenance activities and facilities, twice per year to verify contractor adherence to City technical specifications for landscape maintenance, street sweeping, litter control, etc. (Begin in Year 2, twice annually)	Yes	No			x		
GH2	Integrated Waste Management Association	GH-2: Increase the awareness about waste management by including IWMA's website in City brochures and fact sheets and in training programs for City employees. (Year 3)	Yes	Yes					х
GH3	Facility Surveys	GH-3: Develop Facility and Maintenance inspection forms and inspect 2 facilities (Year 2) Begin inspecting all City facilities and 2 maintenance activities per Year. (Year 3, then annually)	Yes	Yes			x		
GH4	Development of BMP Fact Sheets	GH-4: By Year 2, one fact sheet will be developed to address treatment control, or structural control, BMPs.	Yes	Yes			х		
GH5	Employee Training by City Depts.	GH-5: storm water training will occur either quarterly or annually, depending on personnel involved. In addition, managers will be given specific guidance on their departmental and contractual responsibilities for storm water management, while facilities with SWPPPs will have very specific training requirements as directed by the Plan.	Yes	Yes			x		

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature of Permittee (legally responsi	ible person)	Date Signed	
Name (printed)	Title		